

# MINTZ LEVIN

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DOCKET FILE COPY ORIGINAL ORIGINAL

October 27, 2009

**BY HAND**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

FILED/ACCEPTED

OCT 27 2009

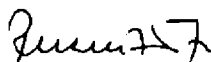
Federal Communications Commission  
Office of the Secretary

**Re: Application of JS Communications LLC for Certification as a Video Relay  
Service Provider**

Dear Ms. Dortch:

Enclosed for filing with the Federal Communications Commission in accord with Section 64.605 of the rules of the Commission is an original and four copies of the Application of JS Communications LLC for Certification as a Video Relay Service Provider. Please contact the undersigned with any questions or need for additional information.

Respectfully submitted,



Russell H. Fox

Enclosure

cc: Thomas Chandler  
Lorna P. Campbell

No. of Copies rec'd 0+4  
List ABCDE

**Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.**

BOSTON | WASHINGTON | NEW YORK | STAMFORD | LOS ANGELES | PALO ALTO | SAN DIEGO | LONDON

Before the  
Federal Communications Commission  
Washington, DC 20554

FILED/ACCEPTED  
OCT. 27 2009  
Federal Communications Commission  
Office of the Secretary

In the matter of )  
)  
Telecommunications Relay Services and )  
Speech-to-Speech Services for )  
Individuals with Hearing and Speech )  
Disabilities ) CG Docket No. 03-123  
)  
Application of JS Communications for )  
Certification as a Video Relay Service )  
Provider )

To: Chief, Consumer and Governmental Affairs Bureau

**APPLICATION OF JS COMMUNICATIONS FOR CERTIFICATION  
AS A VIDEO RELAY SERVICE PROVIDER**

JS Communications LLC ("JS Communications"), by its counsel, hereby submits its application to the Federal Communications Commission ("FCC" or "Commission") for certification that the company is eligible to receive reimbursement from the Interstate Telecommunications Relay Service ("TRS") Fund as a provider of Video Relay Service ("VRS").<sup>1/</sup> JS Communications is an experienced telecommunications services provider, already offering Internet-based communications services. JS Communications has both the capability and the resources to provide high quality VRS that can benefit thousands of persons with speech or hearing impairments. It proposes to offer services using the expertise of Accessible Communication for the Deaf ("ACD"), an established provider of interpreter services for the deaf. Because of its agreement with ACD, users of JS Communications' VRS service will

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<sup>1/</sup> See 47 C.F.R. § 64.606; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Report and Order and Order on Reconsideration, 20 FCC Rcd. 20577 (2005).

immediately have the benefit of respected and highly trained American Sign Language (“ASL”) interpreters acting as Communications Assistants (“CAs”). The public interest would be served by making this resource, through JS Communications, available to the deaf community. As described below, JS Communications meets all of the standards required for certification as a VRS provider and asks that the Commission promptly grant the requested certification.

## **I. Background**

JS Communications, founded in October 2003, is a privately held corporation with significant experience providing telecommunications services using both the public switched telephone network (“PSTN”) and the Internet. JS Communications has significant experience in providing wholesale telecommunications services on an all-private voice over Internet protocol (“VoIP”) network, using multiple switching facilities that are connected to several tier one carriers to assure the highest quality voice and data transmission while providing reliability, stability and redundancy.<sup>2/</sup> In particular, JS Communications provides U.S. termination, toll free origination, local direct inward dialing (“DID”) access numbers, and international termination.

JS Communications’ network currently consists of multiple switches in Miami and Fort Lauderdale, Florida, as well as in New York. The company has six in-house employees and several outside agents. It has strategic alliances with companies such as Gafachi Communications, IP Communications, PowerNet Global, Telaris Communications and Vitelity Communications. JS Communications staff has more than 30 years combined experience in the telecommunications industry. Summaries of telecommunications experience of key JS Communications personnel are provided in Attachment A.

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<sup>2/</sup> JS Communications is registered with the Florida Public Service Commission as an Intrastate Interexchange Telecommunications Company (IXC) and has received a Section 214 Authorization from the Federal Communications Commission. See Section G., *infra*.

JS Communications will offer its VRS using the services of ACD.<sup>3/</sup> ACD, operating in South Florida since 2003, has contracts with and provides sign language interpreter services to numerous institutions, including the Miami-Dade and Broward County public school systems, the University of Miami Medical Campus, Florida International University, Miami-Dade College, and the U.S. Postal Service. In addition to its live interpreting services, ACD offers video remote interpreting over Internet connections. All of ACD's more than 70 interpreters are either nationally certified by the Registry of Interpreters for the Deaf ("RID") or have Quality Assurance Screening from the Florida Registry of Interpreters for the Deaf ("FRID").

ACD offices are located around the corner from JS Communications' corporate offices and ACD has its own on-site training facility. Under JS Communications' supervision, ACD will use its on-site training facility to ensure that CAs are fully trained in VRS operations and in compliance with rules governing VRS operations. ACD will provide interpreters at its facilities, under JS Communications' direction, with computers, microphones, cameras, and other equipment needed to provide VRS. JS Communications will provide the telecommunications infrastructure necessary to the provision of VRS, including bandwidth, voice paths, ten-digit telephone numbers, connectivity to the E911 infrastructure, and connectivity to local, long distance, and international calling. JS Communications will also provide the administrative structure, management, and oversight to ensure provision of quality services and compliance with all VRS regulatory requirements.

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<sup>3/</sup> Although JS Communications has arranged for ACD to supply it with the services of Communications Assistants ("CAs"), JS Communications will be solely responsible under the FCC's rules as the provider of VRS services. In the unlikely event that JS Communications ends its relationship with ACD, JS Communications will either hire its own trained CAs who will meet the obligations referenced herein or enter into an agreement with an alternative provider of CA services that can meet the high standards described here. Any references to ACD contained here, therefore, mean either ACD or a successor provider of CA services.

JS Communications seeks to offer quality VRS with a focus on technology and customer ease of use, applying the company's experience in cutting edge technology to the provision of communications services. JS Communications' experience in providing high quality communications services, coupled with ACD's experience in providing high quality interpreting services for the deaf, will immediately make JS Communications a meaningful competitor in the VRS market, providing consumers with greater choice and potentially stimulating development of new and improved services. Certification of JS Communications to provide VRS is, therefore, both in the public interest and consistent with the Commission's rules.

Section 64.606(a)(2) of the FCC's rules states that any entity desiring to provide VRS, independent from a certified state TRS program or a TRS provider otherwise eligible for compensation from the Interstate TRS Fund, and desiring to receive compensation from the Interstate TRS Fund, shall submit documentation to the FCC describing in narrative form eight (8) matters designed to demonstrate its fitness as a VRS provider. JS Communications hereby provides that information below.

## **II. Narrative Required by Section 64.606(a)(2).**

### **A. A description of the forms of TRS to be provided.**

JS Communications will provide all non-waived forms of VRS.<sup>4/</sup>

### **B. A description of how the provider will meet all non-waived mandatory minimum standards applicable to each form of TRS offered.**

JS Communications has established a VRS call center to be located in Fort Lauderdale, Florida and will, through arrangement with ACD, provide the ASL translation services needed to

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<sup>4/</sup> See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Order, 23 FCC Rcd. 18334 (2008) (extending through January 1, 2010, waiver of any requirement that VRS providers offer certain types of TRS, including Voice Carry Over ("VCO") and Hearing Carry Over ("HCO") services).

provide high quality VRS. While the interpreter services will be provided through agreement with ACD, JS Communications will ensure that ACD maintains the same high service standards. JS Communications applies to its own employees and JS Communications will ensure compliance with the non-waived operational, technical, and functional standards of Section 64.604 of the FCC's rules. A brief description of those standards is provided below.

## **1. Operational Standards**

### **(a) Communications Assistants -- 64.604(a)(1)**

The FCC's rules specify the qualifications and required behavior of Communications Assistants ("CAs"). JS Communications believes that the competency of its CAs will be paramount to the provision of excellent VRS to persons with hearing and speech impairments. The company is committed to establishing rigorous proficiency standards for ACD's CAs that meet or exceed the minimums established in FCC rules. Well-skilled and well-trained sign language interpreters are critical to the provision of VRS and JS Communications will work with ACD to employ an intensive screening process to select only well-qualified interpreters and provide ongoing training to ensure interpreters' skills are kept well-honed. As noted above, all of the interpreters employed by ACD -- and therefore all of the interpreters who will be used by JS Communications to offer VRS -- are certified by either the RID or the FRID.

JS Communications will ensure that all CAs are knowledgeable about service requirements for confidentiality, staying with calls, and other TRS requirements expressed in Section 64.604(a)(1) of the regulations. Initial training and regular updates on TRS rules will be provided to CAs. JS Communications will use its best efforts to accommodate users' requests for specific CA gender both at call initiation and at transfer, if necessary. To the extent not

specifically stated here, JS Communications will meet all of the other obligations of Section 64.604(a)(1) of the rules.

**(b) Confidentiality and Conversation Content -- 64.604(a)(2)**

The rules specify CA obligations to protect confidentiality of the content of calls. JS Communications will ensure through training and supervision that ACD and its own personnel will adhere to these obligations.

**(c) Types of Calls -- 64.604(a)(3)**

This section of the regulations specifies the types of calls that TRS providers must handle. Consistent with those obligations, JS Communications will not refuse calls or limit the length of calls. All calls, including long distance calls, will be completed without charge to the consumer. While JS Communications does not initially expect to handle the types of calls that have been waived by the FCC, the company hereby commits to make reasonable efforts to address the technological issues that prompted the waivers and will handle those types of calls when those waivers expire or seek a further waiver of the obligation to handle those calls.

**Voice Mail and Interactive Menus** -- JS Communications will ensure that CAs immediately inform VRS users of the presence of any recorded messages and relay information conveyed by the recording. Similarly, it will ensure that CAs inform callers of any interactive menus that may be encountered in placing a call and assist callers with working through the menu to route their call to the preferred location or retrieve the information they want. JS Communications will ensure that CAs assist VRS users in leaving voice messages on voice mail systems.

**(d) Handling of Emergency Calls for TTY-Based TRS Providers -- 64.604(a)(4)**

This provision of the regulations does not apply to VRS. JS Communications' explanation of its compliance with emergency calling requirements under section 64.605 is included below.

**(e) STS Called Numbers -- 64.504(a)(5)**

The Commission has waived, for VRS providers, the requirement under this provision of the regulations that CAs maintain a list of names and telephone numbers speech-to-speech ("STS") users call. At such time as this waiver is lifted, JS Communications expects to comply with any established requirement.

**2. Technical Standards**

**(a) ASCII and Baudot -- 64.604(b)(1)**

The ASCII and Baudot communication requirement contained in this rule is waived for VRS.

**(b) Speed of Answer -- 64.604(b)(2)**

JS Communications will ensure that it will meet or exceed the speed of answer requirements of this section of the regulations for VRS calls. The company will establish an automated monitoring system for ACD to employ that will continually measure speed of answer, with regular reports provided to JS Communications. A sufficient number of CAs will be scheduled at all times to ensure callers are not faced with lengthy waits for service.

**(c) Equal Access to Interexchange Carriers -- 64.604(b)(3)**

The requirements of this provision of the regulations have been waived for VRS providers, so long as they provide free long distance service to end users. JS Communications



will provide such free long distance service and is therefore not obligated to comply with this regulation.

**(d) TRS Facilities -- Continuous Operations -- 64.604(b)(4)**

As contemplated by this rule, JS Communications will maintain, through its arrangement with ACD, continuous operation of its VRS, accepting calls twenty-four hours a day, seven days a week. System redundancy features and uninterruptible power supply provisioning will ensure that technical problems will not impede the availability of services.

**(e) Technology -- 64.604(b)(5)**

The requirement, as provided in this rule, that TRS providers using SS7 technology comply with Calling Party Telephone Number rules is not applicable to VRS, because IP-based services are not currently capable of using SS7 technology.

**(f) Caller ID -- 64.604(b)(6)**

As contemplated by this rule, to the extent that current or future technology permits, JS Communications commits to comply with the requirement to transmit caller ID information to the public network.

**3. Functional Standards**

**(a) Complaint Log -- 64.604(c)(1)**

As required by this section of the regulations, JS Communications will maintain a continuous log of any consumer complaints received, with information on the date of the complaint, description of the complaint, the resolution, and the date resolved. As required, a report of the number of complaints received will be provided to the FCC each July first.

**(b) Contact Person -- 64.604(c)(2)**

This rule requires designation of a contact person to coordinate with the Commission on TRS matters. The designated TRS contact for JS Communications is:

Art Sehter  
Director  
JS Communications, LLC  
4846 N. University DR  
Fort Lauderdale, FL 33351  
Voice: (954) 724-3041  
Fax: (954) 726-6170  
art@jscommunication.us

**(c) Public Access to Information and Consumer Outreach --  
64.604(c)(3)**

JS Communications will take steps to ensure that potential users are made aware, as required by this rule, of the availability of JS Communications' VRS through a website, advertising, consumer trade show presentations, meetings with user communities, distribution of informational materials, direct mailing to consumers, online communication, and other promotional methods.

**(d) Rates -- 64.604(c)(4)**

JS Communications commits that, in compliance with this provision of the rules, users of its VRS will not be charged for services at rates greater than would be paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance between the point of origination and the point of termination. At the current time, JS Communications does not intend to assess any charge to users of its VRS, even for calls that are long distance.

**(e) Jurisdictional Separation of Costs -- 64.604(c)(5)**

JS Communications certifies that it will provide true and accurate data and other historical, projected, and state rate related information reasonably requested by NECA necessary to determine TRS fund revenue requirements and payments as specified in Section 64.604(c)(5)(iii)(C), unless those obligations are otherwise waived or modified for providers of Internet protocol ("IP")-based TRS services.

Because of technical difficulty in identifying the interstate or intrastate jurisdiction of VRS, the service is currently reimbursed from the Interstate TRS Fund. At such time as the FCC may determine that it is possible to jurisdictionally separate costs for VRS, JS Communications will comply with cost separation instructions contained in this provision of the regulations and otherwise established by the Commission.

**(f) Complaints -- 64.604(c)(6)**

JS Communications' user complaint procedures are described below and the company has committed to maintain a complaint log and to submit a summary to the Commission each July 1st. JS Communications understands that complaints about its VRS may also be filed directly with the FCC, and the company commits to cooperate fully in any investigation or other procedure the Commission may undertake to resolve complaints it may receive about JS Communications' services.

**(g) Confidential Treatment of TRS Customer Information -- 64.604(c)(7)**

JS Communications commits that, consistent with this provision of the rules, all customer information about users of its VRS will be treated confidentially and will not be sold, distributed, shared, or revealed in any way by JS Communications or any of its employees, unless compelled to do so by lawful order.

#### **4. Customer Registration**

##### **(a) Designation as Default Provider and Number Assignment -- 64.611**

JS Communications will, consistent with this provision of the rules, provide users of its VRS the opportunity to register with JS Communication as their “default provider,” pursuant to which JS Communications will either facilitate the user’s valid number porting request or assign the user a geographically appropriate North American Numbering Plan (“NANP”) number. Thereafter, JS Communications will route and deliver all of the user’s inbound and outbound calls, unless the user chooses to place a call with, or receives a call from an alternate VRS provider. JS Communications will not assign a proxy or alias for a NANP telephone number to any user.

As the default provider for its VRS customers, JS Communications will obtain from users current routing information, including IP addresses or domain names and user names, and provision that information in internal databases and the TRS Numbering Directory. JS Communications will take necessary steps to ensure that it will provision routing information to the TRS Numbering Directory only for those users for which JS Communications has been designated the default provider. JS Communications recognizes that it must query the TRS Numbering Directory to obtain accurate routing information for all VRS users.

##### **(b) Registered Location Information -- 64.605(b)(4)**

JS Communications will, prior to initiation of service, obtain from each registered user the physical location at which the service will first be used. Users will be informed of the importance of updating their registered location. JS Communications will establish a means by which users can easily update their registered location information through the JS

Communications website.<sup>5/</sup> Users will also be able to update their registered location information by interacting with a JS Communications CA.

**(c) User Notification and Acknowledgement -- 64.611(f)**

JS Communications will maintain an advisory on its website and in any promotional materials that addresses the following issues: (1) the process for obtaining a ten-digit number from JS Communications; (2) the portability of ten-digit numbers assigned to VRS users; (3) the process for submitting, updating, and confirming receipt by JS Communications of registered location information; and (4) an explanation emphasizing the importance of maintaining accurate, up-to-date registered location information in the event the user needs to place an emergency call using JS Communications VRS. JS Communications will obtain and retain affirmative acknowledgement from each registered user of having received and understood this advisory.

**5. Emergency Calling Requirements -- 64.605**

JS Communications will transmit any emergency call using its VRS system to the appropriate public safety answering point ("PSAP"), along with automatic number identification ("ANI"), the caller's registered location, information indicating that the call is being placed by JS Communications VRS, and the CA's identification number. All 911 calls will be routed through the use of ANI and, if necessary pseudo-ANI, via the dedicated wireline E911 network.

JS Communications will implement a system to prioritize emergency calls so that they are answered before non-emergency calls. JS Communications will ensure that ACD CAs will be trained to request the caller's name and location at the beginning of any emergency call,

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<sup>5/</sup> Because VRS is initiated through an Internet website, the web page is essentially the equivalent of the customer premises equipment ("CPE") which the rules require that a consumer must be able to use to update his or her registered location. 47 C.F.R. § 605(b)(4)(ii).

except where the caller's registered location information is already on file with JS Communications. In the event one or both legs of an emergency call is disconnected, JS Communications will ensure that ACD CAs will be trained to re-establish the call by contacting the calling party, the PSAP, or both. Information obtained by JS Communications as a result of assisting with an emergency call will be used only for emergency or law enforcement purposes.

**6. Other Requirements**

**(a) Notification of Substantive Changes -- 64.606(f)**

JS Communications commits to provide notice to the FCC of substantive changes to JS Communications' VRS within 60 days of when any such changes occur. JS Communications will, at the time any such notification is made, also certify that the company's VRS continues to meet minimum federal standards after implementing the substantive change.

**(b) Annual Reports -- 64.606(g)**

JS Communications commits to provide the FCC with annual compliance reports on its VRS, transmitting such information as the Commission may require for such reports.

**(c) Other**

JS Communications commits to meet or exceed any and all other standards for VRS that have been or will be established by the FCC.

**C. A description of the provider's procedures for ensuring compliance with all applicable TRS rules.**

JS Communications commits to meeting or exceeding minimum standards and establishing a track record of continuous compliance with VRS rules. JS Communications personnel and CAs employed through ACD will be well-trained as to regulatory requirements and will comply with relevant FCC service rules at all times. JS Communications will designate

a member of its management team as a “compliance officer” to provide regular oversight to ensure all regulatory requirements are met by it and its CAs at all times.

Comprehensive training of all personnel involved with VRS operations will be provided. Regular training updates and refresher training will be provided to ensure that all persons involved in offering services – particularly CAs – continuously have a thorough, up-to-date understanding of the rules governing the offering of VRS.

**D. A description of the provider’s complaint procedures.**

JS Communications will provide for acceptance and resolution of consumer complaints through several means. An online complaint form will be made available on the Internet web portal for JS Communications’ VRS. Procedures will also be established for accepting complaints through the mail or by telephone (with CA assistance as appropriate). Information on where complaints should be directed will be made available on the company’s website and from CAs. CAs will be instructed to assist consumers to make complaints either through the web-based complaint system or by mail to the compliance officer. In the event a consumer does not wish to use either the web-based complaint system or complain by mail, CAs will be trained to summarize the consumer’s complaint, obtain relevant contact information, and forward the information to the compliance officer.

The compliance officer will regularly monitor the web-based complaint facility, as well as communications by mail and information from CAs, to ensure complaints are responded to promptly. Complaints beyond the ability of the compliance officer to resolve will be escalated to a higher level officer at the company. Complainants will also be informed, as part of the response to any complaint, that they may contact a designated higher level company official or the FCC if they are dissatisfied with the response.

Many matters and questions – particularly technical questions – that might otherwise result in a consumer complaint can be resolved by provision of timely information. Accordingly, JS Communications will provide a variety of on-line support resources, including a comprehensive “frequently asked questions” page, to provide consumers with immediate resolution to many questions or problems.

**E. A narrative describing any areas in which the provider’s service will differ from the applicable mandatory minimum standards.**

JS Communications VRS will not differ in any way from the mandatory minimum standards established by the Commission.

**F. A narrative establishing the services that differ from the mandatory minimum standards do not violate applicable mandatory minimum standards.**

Because JS Communications VRS will not differ from the mandatory minimum standards established by the Commission, no narrative is required here.

**G. Demonstration of status as a common carrier.**

Attached as Attachment B is a copy of the “Florida Registration of Intrastate Interexchange Telecommunications Company (IXC)” issued to JS Communications by the Florida Public Service Commission. Also attached as Attachment C is a copy of a page from an online directory of the Florida Public Service Commission listing JS Communications as a currently regulated telecommunications company in the State of Florida.<sup>6/</sup> JS Communications has also received a Section 214 Authorization from the Federal Communications Commission.<sup>7/</sup>

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<sup>6/</sup> Florida Public Service Commission, All Currently Regulated Telecommunications Companies, <http://www.psc.state.fl.us/utilities/mcd/Display.aspx?numPerPage=50>.

<sup>7/</sup> ITC-214-20070509-00180.



**H. A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.**

JS Communications hereby commits to providing required annual compliance reports to the FCC and to promptly and fully comply with any other requests by the Commission for data or information about the operation of JS Communications' VRS operation.

**III. Conclusion**

As demonstrated above, JS Communications meets all of the regulatory requirements for certification to receive reimbursement from the Interstate TRS Fund for provision of Video Relay Services and grant of this application will serve the public interest. JS Communications therefore respectfully requests the Commission's expeditious grant of such certification.

Respectfully Submitted,



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Russell H. Fox  
Ernest C. Cooper  
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and Popeo, P.C.  
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Lorna P. Campbell  
Chief Executive Officer  
JS Communications  
4846 N. University Dr.  
Fort Lauderdale, FL 33351  
954-724-3041

October 27, 2009

**Attachment A**

**JS COMMUNICATIONS  
EXPERIENCE OF KEY PERSONNEL**

## **JS Communications**

### **Experience of Key Personnel**

**Lorna P. Campbell** is the CEO of JS Communications, a position she has held for the past five years. Lorna previously spent more than twenty years working in New York City as a Managing Director in the IT Department at Friemanit Inc. She was also a manager USAGLOBALSAT, a successful company involved in the commercial installation of satellite dishes. At USA GLOBALSAT, Lorna was instrumental in the company's growth and was involved in negotiating contracts with various vendors as well as managing personnel.

**Derek Campbell** is one of the principals of J.S. Communications. Derek has a degree in computer engineering and was employed for fifteen years by Sound Advice as their lead technician. Derek was previously part owner of USAGLOBALSAT. Derek later helped form J.S. Communications LLC where he assumed the position of Network Operations Manager and was responsible for installing and maintaining the JS Communications network.

**Julian Ospina** is IT Manager / Telecommunications Engineer for JS Communications. He is responsible for switch management and administration, network review, design and improvement, as well as administration of the company's overall IT operations. Julian oversees research and implementation of latest the latest telecommunications and VRS IP infrastructure for the company. Prior to joining JS Communications, Julian was Senior IT Manager for Reliance Technologies, Inc. in Stamford Connecticut. Julian brings over fifteen years of technical experience to the company. Julian has over nine years of desktop administration and support experience, over seven years of experience with Local Area Networks Design and Administration, as well as extensive experience with Internet related systems and Internet infrastructure, including experience with WAN deployment and administration. Julian also has extensive experience with VOIP gateways and infrastructure.

**Art Sehter** is Director of Sales at JS Communications. Art has more than twenty one years of experience in sales management in the telecommunications industry. Art spent 12 years in New York in the paging industry as Sales Manager for Pageamerica, later moving to Aquis Communications where he managed the sales force covering New York, New Jersey, Philadelphia and Delaware.

**Attachment B**

**JS COMMUNICATIONS REGISTRATION AS AN INTRASTATE INTEREXCHANGE  
TELECOMMUNICATIONS COMPANY (IXC) IN THE STATE OF FLORIDA**

Date of Florida



ORIGINAL

Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

RECEIVED  
JUN 7 10:50 AM  
COMMISSION CLERK

**DATE:** June 7, 2007  
**TO:** Ann Cole, Commission Clerk – PSC, Office of Commission Clerk  
**FROM:** Division of Competitive Markets & Enforcement (McCoy) *sm*  
Office of the General Counsel (McKay) *VSIN* *Plan* *sm*  
**RE:** Docket No. 070318-TI; Florida Registration of Intrastate Interexchange  
Telecommunications Company (IXC)

On May 16, 2007, this Commission received contact information and a tariff from J. S. Communications, LLC. Staff has determined that the documents received meet the requirements of Section 364.02(13), Florida Statutes.

J. S. Communications, LLC is assigned TK148 as its IXC Registration Code for the state of Florida. As required by Section 2.07.C.5.h., Administrative Procedures Manual, the company has provided the required contact information and tariff to be acknowledged as a registered intrastate interexchange telecommunications company effective May 16, 2007.

Accordingly, with this Memorandum, Docket No. 070318-TI should be closed.

*OK to close 6/7/07 sm*

c: J. S. Communications, LLC

CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
EGR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SGA \_\_\_\_\_  
SEC \_\_\_\_\_  
OTH *None*

DOCUMENT NUMBER-DATE

04606 JUN-75

FPSC-COMMISSION CLERK

**Attachment C**

**EXCERPT FROM THE ONLINE DIRECTORY OF THE FLORIDA PUBLIC SERVICE  
COMMISSION LISTING JS COMMUNICATIONS AS AN ACTIVE REGULATED  
TELECOMMUNICATIONS COMPANY IN THE STATE OF FLORIDA**

| Currently Regulated Interexchange Telephone Utilities<br>Records found: 501 (25 per page) |   |
|---|---|
| Company Code  | Company Name  |
| <a href="#">TJ582</a>   | <a href="#">Intellifiber Networks, Inc.</a>   |
| <a href="#">TK052</a>   | <a href="#">Interactive Media Technologies, Inc. d/b/a GlobalTel</a>  |
| <a href="#">TJ514</a>   | <a href="#">Interactive Services Network, Inc. d/b/a ISN Telecom</a>  |
| <a href="#">TJ926</a>   | <a href="#">InterGlobe Communications, Inc.</a>   |
| <a href="#">TI587</a>   | <a href="#">International Telecom, Ltd.</a>   |
| <a href="#">TI448</a>   | <a href="#">Interstate FiberNet, Inc.</a>   |
| <a href="#">TK158</a>   | <a href="#">IP Telecom Group Inc</a>  |
| <a href="#">TK252</a>   | <a href="#">IP To Go LLC</a>  |
| <a href="#">TK221</a>   | <a href="#">IP-COM, Inc.</a>  |
| <a href="#">TI560</a>   | <a href="#">ITI Inmate Telephone, Inc.</a>  |
| <a href="#">TK162</a>   | <a href="#">ITS Telecommunications Systems, Inc.</a>  |
| <a href="#">TK072</a>   | <a href="#">JC Telecommunication Co., LLC</a>   |
| <a href="#">TK148</a>   | <a href="#">J.S. Communications, LLC</a>  |
| <a href="#">TI506</a>   | <a href="#">KDDI America, Inc.</a>  |
| <a href="#">TJ066</a>   | <a href="#">Kenarl Inc. d/b/a Lake Wellington Professional Centre</a>   |
| <a href="#">TK185</a>   | <a href="#">Kmedia, Inc. d/b/a Vivophone</a>  |
| <a href="#">TJ129</a>   | <a href="#">Knology of Florida, Inc.</a>  |
| <a href="#">TK204</a>   | <a href="#">Krush Communications LLC</a>  |
| <a href="#">TI626</a>   | <a href="#">KTNT Communications, Inc. d/b/a IDC Telecommunications</a>  |
| <a href="#">TK226</a>   | <a href="#">Latin Telecom Trade Inc.</a>  |
| <a href="#">TJ646</a>   | <a href="#">LCR Telecommunications L.L.C.</a>   |
| <a href="#">TJ523</a>   | <a href="#">LD Telecommunications, Inc.</a>   |
| <a href="#">TI390</a>   | <a href="#">LDC Telecommunications, Inc.</a>  |
| <a href="#">TI425</a>   | <a href="#">LDMI Telecommunications, Inc. d/b/a Cavalier Telephone d/b/a Cavalier Business Communications</a> |
| <a href="#">TI387</a>   | <a href="#">Least Cost Routing, Inc.</a>  |
| 1 2 3 4 5 6 7 8 9 10 ...  |   |